

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

OPTIS WIRELESS TECHNOLOGY, LLC,
OPTIS CELLULAR TECHNOLOGY, LLC,
UNWIRED PLANET, LLC, UNWIRED
PLANET INTERNATIONAL LIMITED,
AND PANOPTIS PATENT
MANAGEMENT, LLC.,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Case No. 2:19-CV-0066-JRG

JURY TRIAL DEMANDED

**JOINT MOTION TO CONDUCT
AN EXPERT DEPOSITION AFTER CLOSE OF EXPERT DISCOVERY**

Defendant Apple Inc. and Plaintiffs Optis Wireless Technology, LLC, Optis Cellular Technology, LLC, Unwired Planet, LLC, Unwired Planet International Limited, and PanOptis Patent Management, LLC (collectively, “the parties”) respectfully move for leave to conduct an expert deposition after close of expert discovery.

On June 9, 2020, the Court granted the parties’ motion to conduct five expert depositions after the close of expert discovery. Dkt. 158. The parties have completed four of the expert depositions as set forth in that order; however, the parties were unable to schedule the deposition of Plaintiffs’ expert Antonio Virdis by July 17, 2020, as set forth in the Court’s order. Dr. Virdis was not available to travel for his deposition in light of the COVID-19 pandemic and other personal circumstances prior to July 29, 2020. In accommodation of Dr. Virdis’ travel restrictions, the parties have scheduled his deposition to take place after he arrives in London on

July 29, 2020. Therefore, the parties request leave to conduct the deposition of Dr. Virdis on July 29, 2020.

Dated: July 24, 2020

/s/ Samuel F. Baxter

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Dated: July 24, 2020

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Defendant's counsel of record were served with a true and correct copy of the foregoing document by electronic mail on July 24, 2020.

/s/ Samuel F. Baxter

Samuel F. Baxter